

BRIAN J. STRETCH (CSBN 163973)
Acting United States Attorney

KYLE F. WALDINGER (ILSB 6238304)
Assistant United States Attorney

450 Golden Gate Avenue, 11th Floor
San Francisco, California 94102
Telephone: (415) 436-6830
Facsimile: (415) 436-7234

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 07-0337 MHP
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	UNSEALING THE PLEA AGREEMENT
)	
v.)	
)	
JACQUELINE FROEHLICH-L'HEUREAUX,)	
)	
Defendant.)	

The United States of America, by and through its attorney Assistant United States Attorney Kyle F. Waldinger, and the defendant Jacqueline Froehlich-L'Heureaux, by and through her attorney Leland B. Altschuler, hereby stipulate and agree that the Plea Agreement in this matter may be unsealed. In further support of this request, the parties state as follows:

1. The defendant entered her plea of guilty in open Court on June 4, 2007. At that time, the Court ordered that the parties' Plea Agreement be filed under seal.

2. Since that time, the United States has obtained an Indictment charging the defendants David Nosal and Becky Christian with numerous offenses. That case is numbered CR 08-0237 MHP. Both Nosal and Christian have made their initial appearances before Magistrate Judge Larson, and Christian has made her initial appearance before this Court. Both defendants are scheduled to appear before this Court on May 19, 2008.

STIPULATION AND [PROPOSED] ORDER
CR 07-0337 MHP

3. Both Nosal and Christian have requested Rule 16 discovery from the government. The government intends to produce in discovery the defendant Jacqueline Froehlich-L'Heureaux's Plea Agreement to the defendants Nosal and Christian. Before doing so, the United States seeks unseal that agreement.

4. Accordingly, for the reasons stated above, the parties stipulate and agree that the defendant Jacqueline Froehlich-L'Heureaux's Plea Agreement with the United States should be unsealed.

SO STIPULATED.

DATED: May 6, 2008

BRIAN J. STRETCH
Acting United States Attorney

/s/
KYLE F. WALDINGER
Assistant United States Attorney

DATED: May 5, 2008

/s/
LELAND B. ALTSCHULER
Attorney for defendant Jacqueline Froehlich-L'Heureaux

~~PROPOSED~~ ORDER

Good cause appearing therefor, it is hereby ordered that the plea agreement filed in this matter on or about June 4, 2007 is UNSEALED.

DATED: May 7, 2008

MARILYN HALL PATEL
UNITED STATES



STIPULATION AND [PROPOSED] ORDER
CR 07-0337 MHP